



United States Department of Agriculture

United States
Department of
Agriculture

Office of the Chief
Information Officer

1400 Independence
Avenue SW
Washington, DC
20250

April 26, 2019

Delivered via Electronic Mail

Austin Evers
1030 15th Street, N.W.
Suite B255
Washington, D.C. 20005
Email: foia@americanoversight.org

**RE: Freedom of Information Act (FOIA) Request 2018-DA-05861-F
Interim Response**

Dear Mr. Evers:

This is the first interim response to the August 24, 2018, Freedom of Information Act (FOIA) request submitted to the U.S. Department of Agriculture (USDA), Departmental FOIA Office (DFO). The request seeks the following records:

1. Records reflecting communications between Rebeckah Adcock and the USDA Office of Ethics; and
2. All ethics guidance, directives or memoranda provided to Rebeckah Adcock, excluding widely disseminated standard ethics guidance documents or policies that were not personalized for Ms. Adcock.

The request guidance indicates these records are sought “in an effort to shed light on whether Senior Advisor, Rebeckah Adcock, has been influenced by industry interests, including those of her former employer, CropLife America.”

Your request is being processed under the FOIA, 5 U.S.C. § 552.

A search for responsive records was conducted by the Office of the Chief Information Officer’s (OCIO) telecommunications provider, the Client Experience Center (CEC). This provider performs network services for OCIO, including electronic messaging operations, blackberry, mobile device management (MDM), file and print, remote access, voice, network, service desk, and other application services. This interim response includes thirty (30) pages of records that are responsive to your request.

Following a review of the responsive records, the DFO has determined that certain information contained therein should be withheld pursuant to 5 U.S.C. § 552(b)(5) (FOIA Exemption 5) and 5 U.S.C. § 552(b)(6) (FOIA Exemption 6). Below is an explanation of the information that has been withheld.

FOIA Exemption 5

FOIA Exemption 5 protects from disclosure those “inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency.” Among the frequently invoked FOIA Exemption 5 privileges is the deliberative process privilege.

Deliberative Process Privilege

To fall within FOIA’s deliberative process privilege, the records must be both pre-decisional and deliberative; the records must precede the adoption of an agency policy and include the opinions, recommendations, or deliberations on a legal or policy matter. In this instance, the DFO is withholding, under the deliberative process privilege, pre-decisional communications between agency staff, as well as draft versions of Ms. Adcock’s ethics agreement. By withholding this information, the DFO is protecting the integrity of the agency’s decision-making process and ensuring no inhibition of free and frank exchange between agency personnel. The DFO is also ensuring against the premature disclosure of proposed policy, which if released, could cause confusion to the public regarding the agency’s policy positions.

FOIA Exemption 6

Exemption 6 generally is referred to as the “personal privacy” exemption. It provides that the disclosure requirements of the FOIA do not apply to “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” Application of the exemption involves balancing the public’s interest in disclosure against individuals’ privacy interests.

The information withheld under Exemption 6 consists of individuals’ mobile telephone numbers. This information qualifies as “similar files” because it is information in which individuals have a privacy interest. Releasing mobile telephone numbers could subject individuals to unwarranted or unsolicited communications, or even harassment. Furthermore, there is no connection between this information and the operations of the federal government. Since there is a viable privacy interest that would be threatened by disclosure, Exemption 6 authorizes this office to withhold the information. Accordingly, we have determined that the public interest in the information’s release does not outweigh the overriding privacy interests in keeping it confidential.

The DFO will continue processing your FOIA request. Upon issuance of a final response, you will be advised of your right to appeal the DFO’s final determinations.

If you have any questions regarding this letter, please contact Ms. Christine Jordan at 202-772-9091 or electronically at Christine.Jordan@ocio.usda.gov or USDAFOIA@ocio.usda.gov.

Austin Evers
FOIA Case No. 2018-DA-05861-F

You may seek dispute resolution services from the DFO's FOIA Public Liaison, Ms. Ravoyne Payton at USDAFOIA@ocio.usda.gov.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; email at ogis@nara.gov; telephone at 202-741-5770; toll-free at 1-877-684-6448; or facsimile at 202-741-5769.

The DFO Team appreciates the opportunity to assist you in this matter.

Sincerely,

Alexis R. Graves

Alexis R. Graves
Departmental FOIA Officer
Office of the Chief Information Officer


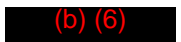

Enclosures: Responsive Records (30 pages)

From: [Tobin, Andrew - OE](#)
To: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: RE: Ethics discussion
Date: Tuesday, April 25, 2017 12:16:58 PM

Perfect. I'll see you at 1PM in 202-B.

"Customer service matters to us, please take our short survey, [click here](#)"

Andrew Tobin
 Deputy Director
 USDA Office of Ethics
 1400 Independence Ave. SW
 Room 347-W, JL Whitten Building
 Washington, DC 20250

 202-720-2251 (office)
 (b) (6) (mobile)
 andrew.tobin@oe.usda.gov

From: Adcock, Rebeckah - OSEC, Washington, DC
Sent: Tuesday, April 25, 2017 12:13 PM
To: Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov>
Subject: RE: Ethics discussion

I'm going to grab a bite to eat in office – could meet you in my office in 202-B around 1pm if you think we can be done in an hour? Have a 2pm .

Reb

From: Tobin, Andrew - OE
Sent: Tuesday, April 25, 2017 11:54 AM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: Re: Ethics discussion

I'm open all afternoon. Just got done with the Secretary. What works for you?

Andrew Tobin
 Deputy Director
 USDA Office of Ethics
 1400 Independence Ave. SW
 Room 347W, JL Whitten Building
 Washington, DC 20250

202-720-2251 (office)

(b) (6) (mobile)
andrew.tobin@oe.usda.gov

On Apr 25, 2017, at 11:51 AM, Adcock, Rebeckah - OSEC, Washington, DC
 <Rebeckah.Adcock@osec.usda.gov> wrote:

Andrew –
 How is your afternoon looking?

I have to book another mtg with OBPA, but am anxious to get everything squared away with you before I dig too much.

Reb

From: Tobin, Andrew - OE
Sent: Monday, April 24, 2017 7:46 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: Re: Ethics discussion

Sounds good. I pulled all the LDA reports for the last two years earlier today so we're good to go.

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 Deputy Director
 USDA Office of Ethics
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 Room 347W, JL Whitten Building
 Washington, DC 20250

202-720-2251 (office)
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andrew.tobin@oe.usda.gov

On Apr 24, 2017, at 7:45 PM, Adcock, Rebeckah - OSEC, Washington, DC
 <Rebeckah.Adcock@osec.usda.gov> wrote:

Yes, let's see how our morning goes and find a time in the afternoon once the day becomes clearer.

Rebekah

Sent from my iPhone

On Apr 24, 2017, at 7:20 PM, Tobin, Andrew - OE
<Andrew.Tobin@oe.usda.gov> wrote:

Rebeckah,

Of course. We've been asked to block the morning for a briefing for Secretary Perdue. Do you have time tomorrow afternoon? My schedule is open.

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andrew.tobin@oe.usda.gov

On Apr 24, 2017, at 6:11 PM, Adcock, Rebeckah - OSEC,
Washington, DC <Rebeckah.Adcock@osec.usda.gov> wrote:

Andrew,

Could we finish out our conversation re ethics boundaries for me tomorrow? I am being asked to participate in meetings, but want to be sure I stay within the lane of what is appropriate.

Kindly,

Rebeckah Freeman Adcock
United States Department of Agriculture

Rebeckah.Adcock@osec.usda.gov
202-690-2464 office
(b) (6) cell

From: [Tobin, Andrew - OE](#)
To: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: Re: Ethics discussion
Date: Tuesday, April 25, 2017 12:59:23 PM

Im a little early and outside your suite now. The door is locked and I'm not sure if the doorbell works.

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United States Department of
Agriculture

Rebeckah.Adcock@osec.usda.gov

202-690-2464 office

(b) (6) cell

From: [Tobin, Andrew - OE](#)
To: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: Draft for your review
Date: Wednesday, April 26, 2017 1:16:50 PM
Attachments: [Ethics Agreement - R Adcock.docx](#)

Rebeckah,


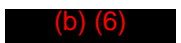

As promised, I've attached a draft ethics agreement for you. Please take a look at it at your convenience.

(b) (5) Deliberative

I'm available to discuss if you have any questions whatsoever. Have a great day.

"Customer service matters to us, please take our short survey, [click here](#)"

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(b) (5) Deliberative

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(b) (5) Deliberative



From: [Adcock, Rebeckah - OSEC, Washington, DC](#)
To: [Tobin, Andrew - OE](#)
Cc: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: RE: Draft for your review
Date: Wednesday, April 26, 2017 3:35:50 PM
Attachments: [Ethics Agreement - R Adcock Edits.docx](#)

(b) (5) Deliberative

From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 1:17 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: Draft for your review

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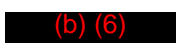



From: [Tobin, Andrew - OE](#)
To: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: RE: Draft for your review
Date: Wednesday, April 26, 2017 3:47:51 PM
Attachments: [Ethics Agreement - R Adcock \(to be signed\).docx](#)

Sorry, forgot to attach the document. It's attached to this email.

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Andrew Tobin
 Deputy Director
 USDA Office of Ethics
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From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 3:47 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review




Thanks, Rebeckah. (b) (5) Deliberative

[REDACTED]

[REDACTED]

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From: Adcock, Rebeckah - OSEC, Washington, DC
Sent: Wednesday, April 26, 2017 3:36 PM

To: Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov>
Cc: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review

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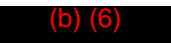

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Washington, DC 20250

 202-720-2251 (office)
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 andrew.tobin@oe.usda.gov

April 26, 2017

FROM: REBECKAH ADCOCK
Senior Advisor to the Secretary
USDA

TO: STUART BENDER
Designated Agency Ethics Official and
Director, Office of Ethics
USDA

SUBJECT: Ethics Agreement

The purpose of this letter is to set forth the steps that I will take to avoid any actual or apparent conflict of interest with my duties as Senior Advisor to the Secretary at the U.S. Department of Agriculture. The following agreement is designed to address potential ethics problems identified by the Office of Ethics based upon its review of the financial information provided by me in my OGE 278 Public Financial Disclosure report. This agreement may be modified by the agency as it deems necessary.

AGREEMENT

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

On April 21, 2017, I resigned from my position with CropLife America. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know CropLife America, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed as by Computer Systems Group LLC, an information technology sector business that provides services to Federal sector clients such as the Department of Defense, but does not contract with USDA. For as long as my spouse works for the Computer Systems Group LLC, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the Computer Systems Group Ltd. I also will not participate personally and substantially in any particular matter involving specific parties in which I know the Computer Systems Group LLC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Trump Administration Ethics Pledge Commitments

I understand that as a Trump Administration appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I signed on April 24, 2017. I am bound by its requirements and restrictions in addition to the commitments I have made in this ethics agreement, which may overlap. Of particular note in the Ethics Pledge:

1. I agreed not to participate in any particular matter involving specific parties that is directly and substantially related to my former employer, CropLife America, including regulations and contracts for a period of 2 years from the date of my appointment.

This provision of the Ethics Pledge essentially extends the “cooling off” regarding my former employer imposed by 5 C.F.R. § 2635.502, as outlined above, from one year to two years. As such, I will not participate in any particular matter involving specific parties that is directly and substantially related to CropLife America until April 21, 2019.

2. I agreed not to participate for a period of 2 years from the date of my appointment in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls. Over the past two years, I lobbied on the pieces of legislation listed below:

- H.R. 5, Regulatory Accountability Act of 2017
- H.R. 953, Reducing Regulatory Burdens Act of 2017
- H.R. 1430, HONEST Act
- H.R. 1431, EPA Science Advisory Board Reform Act of 2017
- H.R. 897, Reducing Regulatory Burdens Act of 2015
- H.R. 291, W21
- H.R. 594, Waters of the United States Regulatory Overreach Protection Act of 2015
- H.R. 813, Fixing Operations of Reservoirs to Encompass Climatic and Atmospheric Science Trends Act
- H.R. 1460, Focused Reduction of Effluence and Stormwater runoff through Hydrofracking Environmental Regulation Act of 2015
- H.R. 896, Regulatory Certainty Act of 2015
- H.R. 644, Trade Facilitation and Trade Enforcement Act of 2015
- H.R. 2596, Intelligence Authorization Act for Fiscal Year 2016
- H.R. 1314, Trade Act of 2015
- H.R. 2576, TSCA Modernization Act of 2015
- H.R. 1732, Regulatory Integrity Protection Act of 2015
- H.R. 2029, Consolidated Appropriations Act for Fiscal Year 2016
- H.R. 897, Zika Vector Control Act
- H.R. 2577 Military Construction, Veteran's Affairs, and Related Agencies Appropriations Act, 2017
- S. 697, Frank R. Lautenberg Chemical Safety for the 21st Century Act
- S. 176, W21
- S. 659, Bipartisan Sportsmens Act of 2015
- S. 1269, Trade Facilitation and Trade Enforcement Act of 2015
- S. 998, American Manufacturing Competitiveness Act of 2015
- S. 995, Bipartisan Congressional Trade Priorities and Accountability Act of 2015
- S. 1500, Sensible Environmental Protection Act of 2015
- S. 1140, Federal Water Quality Protection Act

More specifically, my lobbying efforts over the past two years were focused on the following specific issue areas:

- the impact of crop protection products (including herbicides, fungicides and insecticides) on water;

- the impact of crop protection products on human health; and
- international trade matters related to the regulation of chemicals.

I was not involved in lobbying efforts related to the following issue areas:

- the impact of crop protection products on the environment;
- the Endangered Species Act of 1973; and
- pollinators.

Accordingly, as per the terms of the Trump Administration Ethics Pledge, I will not participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area, as identified above, in which that particular matter falls until April 25, 2019.

I believe that the above actions will serve to keep me free from any actual or apparent violation of conflicts laws and regulations. This agreement is effective immediately. If I have any questions regarding the scope or application of this agreement, I will consult the USDA Office of Ethics.

Sincerely,

Rebeckah Adcock
Senior Advisor to the Secretary, USDA

From: [Tobin, Andrew - OE](#)
To: [Adcock, Rebeckah - OSEC, Washington, DC](#)
Subject: Re: Draft for your review
Date: Wednesday, April 26, 2017 10:40:43 PM

Great. I'll grab it first thing Friday morning. Will be out tomorrow. Have a good evening.

Andrew Tobin
 Deputy Director
 USDA Office of Ethics
 1400 Independence Ave. SW
 Room 347W, JL Whitten Building
 Washington, DC 20250

202-720-2251 (office)
 (b) (6) (mobile)
andrew.tobin@oe.usda.gov

On Apr 26, 2017, at 9:37 PM, Adcock, Rebeckah - OSEC, Washington, DC
 <Rebeckah.Adcock@osec.usda.gov> wrote:

Yes, will leave on my desk. Grab even if I'm not at desk .



Sent from my iPhone

On Apr 26, 2017, at 3:54 PM, Tobin, Andrew - OE
 <Andrew.Tobin@oe.usda.gov> wrote:

Perfect. Should I stop by and grab it?

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Subject: RE: Draft for your review

Signed and ready to go.




Reb

From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 3:48 PM
To: Adcock, Rebeckah - OSEC, Washington, DC
<Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review

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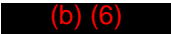

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[REDACTED]

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Subject: RE: Draft for your review
Date: Friday, April 28, 2017 12:48:35 PM
Attachments: [Rebeckah Adcock Ethics Agreement.pdf](#)


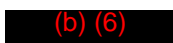

Rebeckah,

I stopped by and picked up the ethics agreement. The scanned copy is attached for your records. When you're ready to fill out your financial disclosure report, I'm happy to walk through that with you. Thanks for handling this so promptly and have a great weekend.

Andrew

"Customer service matters to us, please take our short survey, [click here](#)"

Andrew Tobin
 Deputy Director
 USDA Office of Ethics
 1400 Independence Ave. SW
 Room 347-W, JL Whitten Building
 Washington, DC 20250

 202-720-2251 (office)
 (b) (6) (mobile)
 andrew.tobin@oe.usda.gov

From: Adcock, Rebeckah - OSEC, Washington, DC
Sent: Wednesday, April 26, 2017 9:37 PM
To: Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov>
Subject: Re: Draft for your review

Yes, will leave on my desk. Grab even if I'm not at desk .

Sent from my iPhone

On Apr 26, 2017, at 3:54 PM, Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov> wrote:

Perfect. Should I stop by and grab it?

"Customer service matters to us, please take our short survey, [click here](#)"

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 ✉ andrew.tobin@oe.usda.gov

From: Adcock, Rebeckah - OSEC, Washington, DC
Sent: Wednesday, April 26, 2017 3:53 PM
To: Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov>
Subject: RE: Draft for your review

Signed and ready to go.

Reb

From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 3:48 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review

Sorry, forgot to attach the document. It's attached to this email.

"Customer service matters to us, please take our short survey, [click here](#)"

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From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 3:47 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review

Thanks, Rebeckah. (b) (5) Deliberative

(b) (5) Deliberative

“Customer service matters to us, please take our short survey, [click here](#)”

Andrew Tobin
Deputy Director
USDA Office of Ethics
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 ✉ andrew.tobin@oe.usda.gov

From: Adcock, Rebeckah - OSEC, Washington, DC
Sent: Wednesday, April 26, 2017 3:36 PM
To: Tobin, Andrew - OE <Andrew.Tobin@oe.usda.gov>
Cc: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: RE: Draft for your review

(b) (5) Deliberative

From: Tobin, Andrew - OE
Sent: Wednesday, April 26, 2017 1:17 PM
To: Adcock, Rebeckah - OSEC, Washington, DC <Rebeckah.Adcock@osec.usda.gov>
Subject: Draft for your review

Rebeckah,

As promised, I've attached a draft ethics agreement for you. Please take a look at it at your convenience.


(b) (5) Deliberative

I'm available to discuss if you have any questions whatsoever. Have a great day.

“Customer service matters to us, please take our short survey, [click here](#)”

Andrew Tobin
Deputy Director
USDA Office of Ethics
1400 Independence Ave. SW

Room 347-W, JL Whitten Building
Washington, DC 20250

 202-720-2251 (office)

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 andrew.tobin@oe.usda.gov

April 26, 2017

FROM: REBECKAH ADCOCK
Senior Advisor to the Secretary
USDA

TO: STUART BENDER
Designated Agency Ethics Official and
Director, Office of Ethics
USDA

SUBJECT: Ethics Agreement

The purpose of this letter is to set forth the steps that I will take to avoid any actual or apparent conflict of interest with my duties as Senior Advisor to the Secretary at the U.S. Department of Agriculture. The following agreement is designed to address potential ethics problems identified by the Office of Ethics based upon its review of the financial information provided by me in my OGE 278 Public Financial Disclosure report. This agreement may be modified by the agency as it deems necessary.

AGREEMENT

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

On April 21, 2017, I resigned from my position with CropLife America. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know CropLife America, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed as by Computer Systems Group LLC, an information technology sector business that provides services to Federal sector clients such as the Department of Defense, but does not contract with USDA. For as long as my spouse works for the Computer Systems Group LLC, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the Computer Systems Group Ltd. I also will not participate personally and substantially in any particular matter involving specific parties in which I know the Computer Systems Group LLC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Trump Administration Ethics Pledge Commitments

I understand that as a Trump Administration appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I signed on April 24, 2017. I am bound by its requirements and restrictions in addition to the commitments I have made in this ethics agreement, which may overlap. Of particular note in the Ethics Pledge:

1. I agreed not to participate in any particular matter involving specific parties that is directly and substantially related to my former employer, CropLife America, including regulations and contracts for a period of 2 years from the date of my appointment.

This provision of the Ethics Pledge essentially extends the “cooling off” regarding my former employer imposed by 5 C.F.R. § 2635.502, as outlined above, from one year to two years. As such, I will not participate in any particular matter involving specific parties that is directly and substantially related to CropLife America until April 21, 2019.

2. I agreed not to participate for a period of 2 years from the date of my appointment in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls. Over the past two years, I lobbied on the pieces of legislation listed below:

- H.R. 5, Regulatory Accountability Act of 2017
- H.R. 953, Reducing Regulatory Burdens Act of 2017
- H.R. 1430, HONEST Act
- H.R. 1431, EPA Science Advisory Board Reform Act of 2017
- H.R. 897, Reducing Regulatory Burdens Act of 2015
- H.R. 291, W21
- H.R. 594, Waters of the United States Regulatory Overreach Protection Act of 2015
- H.R. 813, Fixing Operations of Reservoirs to Encompass Climatic and Atmospheric Science Trends Act
- H.R. 1460, Focused Reduction of Effluence and Stormwater runoff through Hydrofracking Environmental Regulation Act of 2015
- H.R. 896, Regulatory Certainty Act of 2015
- H.R. 644, Trade Facilitation and Trade Enforcement Act of 2015
- H.R. 2596, Intelligence Authorization Act for Fiscal Year 2016
- H.R. 1314, Trade Act of 2015
- H.R. 2576, TSCA Modernization Act of 2015
- H.R. 1732, Regulatory Integrity Protection Act of 2015
- H.R. 2029, Consolidated Appropriations Act for Fiscal Year 2016
- H.R. 897, Zika Vector Control Act
- H.R. 2577 Military Construction, Veteran's Affairs, and Related Agencies Appropriations Act, 2017
- S. 697, Frank R. Lautenberg Chemical Safety for the 21st Century Act
- S. 176, W21
- S. 659, Bipartisan Sportsmens Act of 2015
- S. 1269, Trade Facilitation and Trade Enforcement Act of 2015
- S. 998, American Manufacturing Competitiveness Act of 2015
- S. 995, Bipartisan Congressional Trade Priorities and Accountability Act of 2015
- S. 1500, Sensible Environmental Protection Act of 2015
- S. 1140, Federal Water Quality Protection Act

More specifically, my lobbying efforts over the past two years were focused on the following specific issue areas:

- the impact of crop protection products (including herbicides, fungicides and insecticides) on water;

- the impact of crop protection products on human health; and
- international trade matters related to the regulation of chemicals.

I was not involved in lobbying efforts related to the following issue areas:

- the impact of crop protection products on the environment;
- the Endangered Species Act of 1973; and
- pollinators.

Accordingly, as per the terms of the Trump Administration Ethics Pledge, I will not participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area, as identified above, in which that particular matter falls until April 25, 2019.

I believe that the above actions will serve to keep me free from any actual or apparent violation of conflicts laws and regulations. This agreement is effective immediately. If I have any questions regarding the scope or application of this agreement, I will consult the USDA Office of Ethics.

Sincerely,

Rebeckah Adcock
Senior Advisor to the Secretary, USDA